

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

JAMES MADISON PROJECT, et al.,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF JUSTICE,

Defendant.

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Case No. 17-597-APM

**DEFENDANT’S UNOPPOSED MOTION FOR AN EXTENSION**

Defendant United States Department of Justice (“DOJ”) hereby respectfully requests a one-week extension of time in which to file its reply in support of its renewed motion for summary judgment, up through and including September 27, 2019. Defendants filed the renewed motion on August 30, 2019, ECF No. 52, Plaintiffs filed their opposition on September 13, 2019, ECF No. 53, and pursuant to the local rules, Defendant’s reply memorandum is due September 20, 2019, *see* L.R. 7(d).

This is the first extension of this deadline, and it is supported by good cause, including the novelty of the issues presented and the press of other business. Namely, undersigned counsel has at least two additional court-ordered filing deadlines in the next two weeks, including a summary judgment motion due on September 19, 2019. There is no arguable prejudice to Plaintiffs from this brief extension. Undersigned counsel has consulted with opposing counsel, who consents to the extension request.

Dated: September 16, 2019

Respectfully Submitted,

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Principal Deputy Assistant Attorney General

MARCIA BERMAN

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/s/Amy E. Powell

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*Attorneys for Defendants*

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**[PROPOSED] ORDER ON DEFENDANT’S  
UNOPPOSED MOTION FOR AN EXTENSION**

Having considered the submissions of the parties, the Court hereby ORDERS that the Defendant’s Motion for an Extension of Time is GRANTED, and ORDERS that Defendant’s Reply in Support of Defendant’s Renewed Motion for Summary Judgment be filed on or before September 27, 2019.

SO ORDERED.

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U.S. DISTRICT COURT JUDGE